

UNITED STATES DISTRICT COURT  
WISCONSIN EASTERN DISTRICT

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JOSEPH YEOMAN

Plaintiff,

v.

Case No. 23-CV-188-JPS

JON FRY, WILLIAM EMBREY, JOHN  
DOE, JOHN DOE 1, RACINE COUNTY  
ASSISTANT DISTRICT ATTORNEY  
ANTOINETTE L. RICH, AND RACINE  
COUNTY,

Defendants.

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NOTICE OF SUPPLEMENTAL AUTHORITY

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**PLEASE TAKE NOTICE** Plaintiff Joseph Yeoman, moves this court pursuant to **Fed. R. Civ. P. Rule 7** and **U.S. Dist. Ct. E.D. WI. Civ. L. R. 7(k)**, to submit Supplemental Authority in Plaintiff's Sur-Reply brief in opposition to Defendants' Reply Brief in Support of Motion to Dismiss. The grounds for this Notice are as follows:

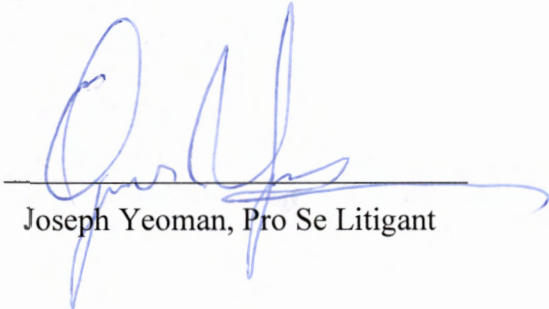
- 1) Pertinent and significant authority relevant to this issue must be raised. Mr. Yeoman a pro se litigant, hereby requests this court for permission to submit his sur-reply brief due to recent decision made by the Supreme court in *Thompson v. Clark*, 142 S. Ct. 1132 (2022); *Smith v. City of Chicago*, 142 S.Ct. 1665 (2022). (See Yeoman's sur-reply brief at pg.'s 1-28)
- 2) Applying *Thompson's* latest accrual rule for **Fourth Amendment malicious prosecution**, has created new controlling precedent that may give grounds to reinstate Plaintiff's **Conspiracy** and *Monell* claims against Defendant's Rich and Racine County.

See *Smith v. City of Chicago, Ill.*, (7<sup>th</sup> Cir.) (2022) WL 2752603 (*See Yeoman's sur-reply brief at pg.'s 1-4, 24-27*).

- 3) Plaintiff also claims **Fourth Amendment wrongful pretrial custody** per "*Manuel I*" and "*Manuel II*"... see *Manuel v. City of Joliet, Ill.* at 368-370, 580 U.S. 357, 137 S.Ct. 911, 197 L.Ed.2d 312 (2017); see also *Manuel v. Joliet, Ill.* at 669-670, 903 F.3d 667 (7<sup>th</sup> Cir. 2018). raised (*See Yeoman's sur-reply brief at pg.'s 1-28*)

Plaintiff submits this Notice of Supplemental Authority to this court pursuant to **Fed. R. Civ. P. Rule 7** and **U.S. Dist. Ct. E.D. WI. Civ. L. R. 7(k)**, prior to plaintiff's filing sure-reply brief by the previously requested extension date of July 31, 2024.

Dated this 29<sup>th</sup> day of July, 2024



Joseph Yeoman, Pro Se Litigant

**JOSEPH YEOMAN**  
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Cc: USDC ED Clerk of Court  
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William Embrey, John Doe, and John Doe 1